

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

IN RE:)	
)	
BROOKLYNNE ALLEN,)	CASE NO. 16-30364-DHW
)	
Debtor.)	CHAPTER 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN
[Internal Revenue Service]

Comes now the United States of America, by and through George L. Beck, Jr., United States Attorney for the Middle District of Alabama, on behalf of the United States Department of the Treasury, Internal Revenue Service (Service) to object to Confirmation of the Debtor's Chapter 13 Plan, and as grounds states as follows:

1. On February 10, 2016, Debtor filed for Chapter 13 relief. Debtor's Plan is set for confirmation in Montgomery, Alabama on May 9, 2016. [Docs. 1, 7].
2. On March 16, 2016, the Service filed an amended Proof of Claim in the total amount of \$44,578.59, of which \$15,190.00 was classified as secured, \$6,600.00 was classified as priority, and \$22,787.98 was classified as unsecured general. [Claim 4-2].
3. On April 25, 2016, Trustee filed an objection to confirmation due in part to Debtor's lack of provision in the Plan for the secured claim of the Service. [Doc. 29].
4. Confirmation was carried forward from May 2, 2016, to allow Debtor time to resolve the lack of provision issues. To date, Debtor's Plan had not been amended to resolve the issues.
4. Debtor's current Plan [Doc. 32] fails to make provision to pay the Service's secured claim of \$15,190.00 and only provides for payment of \$4,862.00 towards the Service's \$6,600.00 priority claim. The Service objects to this lack of payment and

requests that the plan be amended to provide for equal monthly payments to the Trustee to amortize the secured and priority debts to the Service.

WHEREFORE, the United States prays that this Court will withhold confirmation of the Debtor's Chapter 13 Plan until the plan is amended to provide for full payment of the secured and priority claims of the Service through the Chapter 13 Trustee.

Respectfully submitted this the 6th day of May, 2016.

GEORGE L. BECK, JR.
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on this the 6th day of May, 2016, I served a copy of the foregoing document, Objection to Confirmation, on all parties listed below by the methods stated:

Teresa Jacobs
U.S. Bankruptcy Administrator
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[electronic filing]

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/s/DeAnne M. Calhoon
DeAnne M. Calhoon
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